



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Revision of Part 15 of the Commission's Rules to Permit
Unlicensed National Information Infrastructure (U-NII)
Devices in the 5 GHz Band

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ET Docket No. 13-49

COMMENTS OF
FORD MOTOR COMPANY

A handwritten signature in black ink, appearing to read "Steven M. Kenner".

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May 28, 2013



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**COMMENTS OF THE
FORD MOTOR COMPANY**

Ford Motor Company, a domestic manufacturer and importer of motor vehicles with offices at One American Road, Dearborn, Michigan 48126-2798, submits these comments in response to the Notice of Proposed Rulemaking ("NPRM") issued by the Federal Communications Commission ("Commission") in the above-captioned proceeding.¹ The NPRM seeks comment on, *inter alia*, making spectrum in the 5.850-5.925 GHz band ("5.9 GHz band") available for Unlicensed National Information Infrastructure ("U-NII") use.² Ford Motor Company participated in the development of the comments submitted by the Alliance of Automobile Manufacturers (Alliance) and incorporates those comments by reference.³

Since 2002, Ford Motor Company has been researching vehicle-to-vehicle ("V2V") and vehicle-to-infrastructure ("V2I") communication using 5.9 GHz band for Dedicated Short Range Communications Service ("DSRC"). Ford recognizes that DSRC is the incumbent user of the 5.9 GHz band and any other users must demonstrate that they can share the band without harmful interference. Ford has been working with the US Department of Transportation and other Original Equipment Manufacturers to resolve the technical and policy issues to bring this technology to deployment to achieve safety, mobility and environmental benefits for the American transportation system. For example, Ford has equipped eight fully-integrated vehicles that are being tested in the Ann Arbor Model Deployment of Vehicle-to-Vehicle technology.

¹ Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, ET Docket No. 13-49, *Notice of Proposed Rulemaking*, 28 FCC Red 1769 (2013) ("NPRM").

² *Id.* ¶¶ 2, 75.

³ Comments of the Alliance of Automobile Manufacturers, Inc. and Global Automakers, ET Docket No. 13-49.

Ford Motor Company also agrees with the Alliance that the Commission should proceed with extreme caution as it considers the substantial technical, policy, economic, and practical challenges to allow U-NII use of the 5.9 GHz band. Although Ford Motor Company supports the Commission's goal of providing additional spectrum to support wireless broadband services and is fully committed to working with the proponents of U-NII use to evaluate the prospects of coexistence with DSRC, the NPRM raises concerns that could undermine the efforts of government and private sector stakeholders to deploy DSRC safety, mobility and environmental services in the band. Specifically, U-NII use of the 5.9 GHz band could cause harmful co-channel, adjacent channel, and out-of-band interference to DSRC services in numerous ways.

Therefore, the Commission should not allow unlicensed U-NII use of the 5.9 GHz band unless a set of rules and test procedures can be developed and shown, through rigorous bench and field testing, to protect 5.9 GHz DSRC systems from harmful interference. Moreover, before any rules allowing 5.9 GHz U-NII unlicensed use based on such testing are promulgated, the Commission should seek formal public comment on such rules to ensure that they adequately protect DSRC services.